of 11)

(Page 4

Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 1 of 22 E-FILED IN OFFICE - CE
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA

22-A-10891-1 12/27/2022 1:32 PM TIANA P. GARNER, CLERK

General Civil and Domestic Relations Case Filing Information Form

Superior or □ State Court of Gwinnett Superior Court

	For Clerk Use On	oly							
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	ti ff(s) SEASONS TRUCKING,	INC.			Defendant GRANGE N	t(s) MUTUAL CASUA	ALTY COMPANY	· · · · · · · · · · · · · · · · · · ·	
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Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 2 of LERK OF SUPERIOR COURT GWINNETT COUNTY, GEORGIA

22-A-10891-1

General Civil and Domestic Relations Case Filing Information Form

12/27/2022 1:32 PM TIANA P. GARNER, CLERK

Superior or ☐ State Court of	6WINNET	County
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	For Clerk Use Only					22-A-	10891-1			
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Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 3 of 22 E-FILED IN OFFICE - CE

(Page 6

OT 22 E-FILED IN OFFICE - CE CLERK OF SUPERIOR COURT GWINNETT COUNTY, GEORGIA 22-A-10891-1 12/27/2022 1:32 PM TIANA P. GARNER, CLERK

IN THE SUPERIOR COURT OF GWINNETT COUNTY STATE OF GEORGIA

INC.,		
Plaintiff,		
v.)	Civil Action No.	22-A-10891-1
GRANGE MUTUAL CASUALTY) COMPANY,)		-
Defendant.		

COMPLAINT

COMES NOW, plaintiff Four Seasons Trucking, Inc. (sometimes hereinafter "Plaintiff"), and files its Complaint, showing the Court as follows.

1.

Plaintiff Four Seasons Trucking, Inc. is a domestic corporation, and may be contacted by and through counsel of record.

2.

Defendant Grange Mutual Casualty Company (sometimes hereinafter "Grange") is an out of state insurer that has provided insurance coverage for the Plaintiff in a lawsuit currently pending in the State Court of DeKalb County in which the Plaintiff is a defendant. Grange may be served by and through its

registered agent, Linda Banks, located at 289 S. Culver Street, Lawrenceville, GA 30046.

3.

Venue is proper, as defendant resides in Gwinnett County.

4.

Personal jurisdiction is proper, as Grange transacts business in this state.

5.

Subject matter jurisdiction is proper, as this Court is the court of general jurisdiction.

Count I - Declaratory Judgment Relief

6.

Plaintiff re-alleges and incorporates herein by reference the allegations of paragraph one through five of its Complaint.

7.

Plaintiff is currently a defendant in a personal injury lawsuit that is pending in the State Court of DeKalb County, styled <u>Terri Slaughter v. Mark T. Lucas and Four Seasons Trucking, Inc.</u>, Civil Action No. 20A79267 (hereinafter "DeKalb Lawsuit").

8.

This lawsuit arises out of an October 12, 2015 accident that occurred while Plaintiff's employee was operating his vehicle on behalf of plaintiff Four Seasons Trucking, Inc.

9.

Plaintiff claimed insurance coverage for this accident pursuant to Four Seasons Trucking, Inc.'s insurance policy with Grange, Policy Period 3/16/2015 – 3/16/2016, Policy Number CPP 2619526-06 (hereinafter "Trucking Policy"), and pursuant to Four Seasons Trucking & Grading, Inc.'s insurance policy with Grange, Policy Period 10/15/2014 – 10/15/2015, Policy Number CPP 2623822-05 (hereinafter "Grading Policy").

10.

Grange reserved the right to deny coverage, and filed a declaratory judgment in the Northern District of Georgia, Atlanta Division, Civil Action No. 1:16-cv-03058-SCJ, in which Grange, on summary judgment, requested that all insurance coverage for the October 12, 2015 incident be denied.

11.

On February 20, 2018, the District Court for the Northern District of Georgia entered an Order in which it ruled that there was coverage for the October 12, 2015 accident under Four Seasons Trucking & Grading, Inc.'s policy.

12.

Following the District Court's February 20, 2018 Order, Grange continued to defend Four Seasons Trucking, Inc. in the DeKalb Lawsuit.

13.

On April 19, 2021, Grange notified Four Seasons Trucking, Inc. that it would not continue to defend Four Seasons Trucking, Inc. in the DeKalb Lawsuit.

14.

Subsequently, as a result of Grange's decision to not continue to defend Four Seasons Trucking, Inc., the law firm retained by Grange to defend Four Seasons Trucking, Inc. in the DeKalb Lawsuit moved to withdraw from the DeKalb Lawsuit.

15.

As a result of Grange's decision to not continue to defend Four Seasons

Trucking, Inc. in the DeKalb Lawsuit, and the resulting, pending withdrawal in the

DeKalb Lawsuit of counsel that had been retained by Grange to defend Four

Seasons Trucking, Inc., there exists a substantial and actual controversy as to the

rights, duties, and obligations of Grange Mutual Casualty Company.

Because the question of whether Grange has a duty to continue to defend Four Seasons Trucking, Inc. in the DeKalb Lawsuit is in dispute, Four Seasons Trucking, Inc. is in a position of insecurity and uncertainty.

17.

Pursuant to the Declaratory Judgment Act, plaintiff Four Seasons Trucking, Inc. seeks a ruling of the Court adjudicating Grange's rights, duties, and obligations to protect Four Seasons Trucking, Inc. from the risk of taking undirected action.

WHEREFORE, Four Seasons Trucking, Inc. prays as follows:

- a) That the Court enter a declaratory judgment declaring the rights, duties, and obligations of defendant Grange Mutual Casualty Company;
- b) That the Court enter an Order staying the DeKalb Lawsuit pending final resolution of the relief sought in this declaratory judgment action;
- c) That plaintiff Four Seasons Trucking, Inc. have a trial by jury; and
- d) That plaintiff Four Seasons Trucking, Inc. be awarded all other relief that this Court may deem just and proper.

This 23rd day of December, 2022.

KURUVILLA LAW FIRM, P.C.

/s/ John V. Kuruvilla

John V. Kuruvilla Georgia Bar No. 903278 Counsel for plaintiff Four Seasons Trucking, Inc.

Tower Place 100 3340 Peachtree Road, Suite 1800 Atlanta, GA 30326

Telephone: (404) 814-0545 Facsimile: (404) 814-5965

E-Mail: jvk@kuruvillalaw.com

(Page 5 of 11)

Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 9 of 22E-FILED IN OFFICE - CE CLERK OF SUPERIOR COURT

CLERK OF SUPERIOR COURT GWINNETT COUNTY, GEORGIA 22-A-10891-1

IN THE SUPERIOR COURT OF GWINNETT COUNTY

12/27/2022 1:32 PM TIANA P. GARNER, CLERK

STATE OF GEORGIA

TOUR SEASONS		
TRUCKING INC.	CIVIL ACTION NUMBER:	22-A-10891-1
PLAINTIFF		
VS.		
6RANGIE		
MUTUAL		
LASUALTY		
COMPANY DEFENDANT		
SUMMONS		
TO THE ABOVE NAMED DEFENDANT:		
You are hereby summoned and required to file with the Clerk of said court and address is:	d serve upon the Plain	ntiff's attorney, whose name
an answer to the complaint which is herewith served upon you, within 30 days af the day of service. If you fail to do so, judgment by default will be taken against.	ter service of this sun you for the relief dem	nmons upon you, exclusive of anded in the complaint.
This 27th day of December, 2022		•
Rich	ard T. Alexander, Jr.	,
↑ (- 0.	k of Superior Court	-
	Deputy Cleri	•
INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make	notation on this shee	t if addendum sheet is used.
SC-1 Rev. 2011		
John V. Kuruvilla		;
KURUVILLA LAW FIRM, P.C.		

Atlanta, Georgia 20326.

(Civil Action No. 22-A-108 Date Filed 12/27/22 Submitted for filing Attorney's Address Sohn V. Kunuvilla 33 to feachtree Rd. Suite 1800 Name and Address of party to be served. CRANGE MUTUAL (ASUAL COMPANY, by and through enistered agent Linda	Magistrate Court Superior Court State Court Georgia, Gwinnett Coun FOUR SE FRULKT	Plaintiff S. MUTUAL Defendant Plaintiff COMPAN Defendant
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Gwinnett County Sheriff's Office Cover Sheet



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Person Served:

GRANGE MUTUAL CASUALTY COMPANY

289 SOUTH CULVER STREET C/O CSC (LINDA BANKS - RA) LAWRENCEVILLE GA 30046

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COMPLAINT

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(Page 4 of 11)

Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 12 of 22 E-FILED IN OFFICE - CE
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA

22-A-10891-1 12/27/2022 1:32 PM TIANA P. GARNER, CLERK

General Civil and Domestic Relations Case Filing Information Form

 Superior or □ State Court of Gwinnett Superior Court County

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Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 13 ο τως κ of superior court gwinnett county, georgia 22-A-10891-1

General Civil and Domestic Relations Case Filing Information Form

12/27/2022 1:32 PM TIANA P. GARNER, CLERK

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Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 14 of 22_{E-FILED IN OFFICE - CE}

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> 12/27/2022 1:32 PM TIANA P. GARNER, CLERK

IN THE SUPERIOR COURT OF GWINNETT COUNTY STATE OF GEORGIA

FOUR SEASON TRUCKING,) INC.,)		
Plaintiff,		
v.)	Civil Action No.	22-A-10891-1
GRANGE MUTUAL CASUALTY) COMPANY,		_
Defendant.		

COMPLAINT

COMES NOW, plaintiff Four Seasons Trucking, Inc. (sometimes hereinafter "Plaintiff"), and files its Complaint, showing the Court as follows.

1.

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Count I - Declaratory Judgment Relief

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WHEREFORE, Four Seasons Trucking, Inc. prays as follows:

- a) That the Court enter a declaratory judgment declaring the rights, duties, and obligations of defendant Grange Mutual Casualty Company;
- b) That the Court enter an Order staying the DeKalb Lawsuit pending final resolution of the relief sought in this declaratory judgment action;
- c) That plaintiff Four Seasons Trucking, Inc. have a trial by jury; and
- d) That plaintiff Four Seasons Trucking, Inc. be awarded all other relief that this Court may deem just and proper.

This 23rd day of December, 2022.

KURUVILLA LAW FIRM, P.C.

/s/ John V. Kuruvilla

John V. Kuruvilla Georgia Bar No. 903278 Counsel for plaintiff Four Seasons Trucking, Inc.

Tower Place 100 3340 Peachtree Road, Suite 1800 Atlanta, GA 30326

Telephone: (404) 814-0545 Facsimile: (404) 814-5965

E-Mail: jvk@kuruvillalaw.com

(Page 5 of 11)

Case 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page 20 of 22-filed in office - CE CLERK OF SUPERIOR COURT GWINNETT COUNTY, GEORGIA 22-A-10891-1

IN THE SUPERIOR COURT OF GWINNETT COUNTY

12/27/2022 1:32 PM TIANA P. GARNER, CLERK

STATE OF GEORGIA

FOUR SEASONS		
TRUCKING INC.	CIVIL ACTION NUMBER:	22-A-10891-1
PLAINTIFF		
GRANGE		
LASUALTY LOMPANY DEFENDANT		
SUMMONS		
TO THE ABOVE NAMED DEFENDANT:		
You are hereby summoned and required to file with the Clerk of said court and address is:	l serve upon the Plain	ntiff's attorney, whose name
An answer to the complaint which is herewith served upon you, within 30 days aft the day of service. If you fail to do so, judgment by default will be taken against y 27th day of December, 2022 This day of	ou for the relief dem	anded in the complaint.
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INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make	notation on this shee	t if addendum sheet is used.
SC-1 Rev. 2011		
John V. Kuruvilla	,	ţ
KURUVILLA LAW FIRM, P.C. Tower Place 100 3010 Peachtree Road Suite 1860		

Atlanta, Georgia 20326.

(Civil Action No. 22-A-108 Date Filed 12/27/22 Submitted for filing Attorney's Address Sohn V. Kunuvilla 33 to feachtree Rd. Suite 1800 Name and Address of party to be served. CRANGE MUTUAL (ASUAL COMPANY, by and through enistered agent Linda	Magistrate Court Superior Court State Court Georgia, Gwinnett Coun FOUR SE FRULKT	Plaintiff S. MUTUAL Defendant Plaintiff COMPAN Defendant
1 0	Sanks, 2569 S. Culvi		
L€U ē	Wreneville 6A Sheriff's Entry	<u></u>	<u> </u>
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Notorious	I have this day served the defendant a copy of the action and summons at his most notorious place o Delivered same into hands of years; weight, about pounds; he the residence of defendant.	***	by leavingdescribed as followsinches; domiciled at
ation.	Served the defendant Grange Muha	Castralty, Co	a corporation
Corpor	by leaving a copy of the within action and summons within charge of the office and place of doing business of said Corpo	oration in this County.	rdson (J-AT)
Tack & Mail □	I have this day served the above styled affidavit and summons on premises designated in said affidavit, and on the same day of suc Mail, First Class in an envelope properly addressed to the defer postage affixed thereon containing notice to the defendant(s) to	ch posting by depositing a true condant(s) at the address shown in	ppy of same in the United States a said sum hons, with adequate
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WHITE: Clerk CANARY: Plaintiff / Attorney

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Printed: 12/27/2022 3:06/23 PMe 1:23-mi-99999-UNA Document 254-1 Filed 01/25/23 Page Server Sount 1 of 1 By: alewis

Gwinnett County Sheriff's Office Cover Sheet



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Person Served:

GRANGE MUTUAL CASUALTY COMPANY

289 SOUTH CULVER STREET C/O CSC (LINDA BANKS - RA) LAWRENCEVILLE GA 30046

PHONE:

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22-A-10891-1

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COMPLAINT

Notes/Alerts:

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